

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re:

SAFETY-KLEEN CORP., et al.,

Debtors.

Case No. 06-0354 (GMS)

JOINT STATUS REPORT REGARDING CLAIM OF BARBARA CIRINA

Pursuant to D. Del. L.R. 16.2(b), Oolenoy Valley Consulting LLC, as trustee of the Safety-Kleen Creditor Trust and counsel for claimant Barbara Cirina ("Claimant") have conferred regarding each agenda item contained in the Court's April 13, 2007 Order and hereby provide the following joint status report:

I. JURISDICTION AND SERVICE

The Court has subject matter jurisdiction over this proceeding pursuant to 28 U.S.C. §§ 157(b)(6) and 1334. There are no issues regarding personal jurisdiction and no parties remain to be served.

II. SUBSTANCE OF THE ACTION

This is a contested matter arising out of the Chapter 11 bankruptcy cases of Safety-Kleen Corp. and its affiliated debtors (the "Debtors") pending in the United States Bankruptcy Court for the District of Delaware. By its motion filed September 11, 2006, the Trustee seeks an order pursuant to 11 U.S.C. § 502(c) estimating the value of Claimant's claim, No. 6640, pending in the case of Safety-Kleen Services, Inc. By her claim, Claimant seeks a distribution from the Debtors' estates on account of personal injuries allegedly suffered as the

result of an automobile accident involving a vehicle allegedly operated by an agent of the Debtors which occurred several months prior to the June 9, 2000, petition.

III. IDENTIFICATION OF ISSUES

The parties dispute the Debtors' liability for the injuries alleged by the Claimant. The parties also dispute the amount of Claimant's damages should liability be found.

IV. NARROWING OF THE ISSUES

At this time, it does not appear that the issues can be narrowed by agreement or motion. However, as with any case, the issues in dispute may be narrowed through discovery and by decisions on dispositive motions.

V. RELIEF

Claimant is seeking unspecified damages arising from a February 16, 2000 automobile accident. Damages, if any, would need to be determined by the Court.

VI. AMENDMENT OF PLEADINGS

The parties do not currently anticipate any amendment to the pleadings and propose that a cut-off date of May 31, 2007 be placed in the Scheduling Order.

VII. JOINDER OF PARTIES

The parties do not currently anticipate the joinder of any additional parties and propose that a cut-off date of May 31, 2007 be placed in the Scheduling Order.

VIII. DISCOVERY

a. Trustee's Statement. The Trustee served written discovery requests directed to the issues raised in the Claimant's claim on December 22, 2006. To date, Claimant has not provided formal responses, but on March 19, 2007 responded informally with copies of Claimant's medical records.

b. **Claimant's Statement.** The Claimant intend to serve written discovery requests and intends to take the deposition of the individual alleged to have been responsible for the accident.

c. The parties agree that fact depositions should be limited to three per party with a limit of seven hours per deposition, subject to either party requesting additional depositions and/or time upon a showing of good cause. They also agree that all fact and expert discovery should be instituted so that it is completed on or before August 27, 2007.

d. The parties agree that Claimant should identify and serve initial expert reports for her experts on or before June 30, 2007 with the Trustee to identify and serve initial reports for its experts, if any, by August 15, 2007. The parties further agree that expert depositions should be permitted of all identified testifying experts, including any treating physicians or medical experts, subject to the limits noted above. The parties do not believe that any less costly or less time consuming methods are available to obtain the necessary information.

IX. ESTIMATED TRIAL LENGTH

The parties believe that the trial in this matter will last approximately one-half a day.

X. JURY TRIAL

No jury trial has been requested and the parties agree that there is no right to a jury trial in an estimation proceeding conducted pursuant to 11 U.S.C. § 502(c).

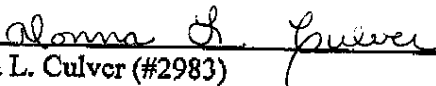
XI. SETTLEMENT

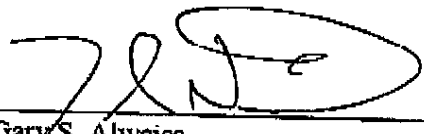
At this time there have not been any substantive settlement discussions. The parties believe that this matter might be properly referred to the United States Magistrate for the purpose of exploring the possibility of a settlement.

XII. STATEMENT OF CONFERENCE

The undersigned counsel has conferred regarding each of the above matters.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP LAW OFFICES OF GARY S. ALWEISS


Donna L. Culver (#2983)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
Counsel for Oolenoy Valley Consulting LLC,
as trustee for the Safety-Kleen Creditor Trust


Gary S. Alweiss
Theodore A. Naima
229 Seventh Street
Suite 300
Garden City, NY 11530
(516) 746-6766
Counsel for Claimant

April 25, 2007

CERTIFICATE OF SERVICE

I, Donna L. Culver, certify that I am not less than 18 years of age, and that service of the foregoing **Joint Status Report Regarding Claim Of Barbara Cirina** was caused to be made on April 25, 2007, in the manner indicated upon the parties identified on the attached service list.

Date: April 25, 2007

/s/ Donna L. Culver

Donna L. Culver (#2983)

SERVICE LIST**BY FIRST CLASS MAIL:**

William B. Baggett, Esq.
 Allwaste (E. Webb et al.)
 c/o Baggett, McCall, Burgess, Watson
 & Gaughan
 3006 Country Club Road
 P.O. Drawer 7820
 Lake Charles, LA 70606-7820

William B. Baggett, Esq.
 Allwaste (J. Ortego et al.)
 c/o Baggett, McCall, Burgess, Watson
 & Gaughan
 3006 Country Club Road
 P.O. Drawer 7820
 Lake Charles, LA 70606-7820

William B. Baggett, Esq.
 Allwaste (J. White et al.)
 c/o Baggett, McCall, Burgess, Watson
 & Gaughan
 3006 Country Club Road
 P.O. Drawer 7820
 Lake Charles, LA 70606-7820

William B. Baggett, Esq.
 Allwaste (L. Shelton et al.)
 c/o Baggett, McCall, Burgess, Watson
 & Gaughan
 3006 Country Club Road
 P.O. Drawer 7820
 Lake Charles, LA 70606-7820

Donna M. & William R. Borthwick
 c/o Siben & Siben Law Offices
 90 East Main Street
 Bay Shore, NY 11706

Donna Chmielarski
 1139 Rushing Parc Dr.
 Birmingham, AL 35244-6752

Barbara Cirina
 c/o Gary Alweiss
 229 Seventh Street
 Suite 300
 Garden City, NY 11530

Barbara Cirina
 43 Ash Street
 Floral Park, NY 11001

Donna Borthwick
 c/o Siben & Siben Law Offices
 90 East Main Street
 Bay Shore, NY 11706

Eartha Morris
 c/o Downer Walters & Mitchner
 Thomas Downer
 301 South Tryon Street, Ste 1760
 Wachovia 2 Center
 Charlotte, NC 28202

Michael Paglino
 Bellavia Gentile & Associates LLP
 200 Old Country Road
 Mineola, NY 11501

John R. Giordano
 248 Connetquot Avenue
 East Islip, NY 11730

Carla Kelley
 300 North J Street
 Palouse, WA 99161

Mildred Kuegeler
 1139 Rushing Parc Dr.
 Birmingham, AL 35244-6752

Willie Morris
 c/o Downer Walters & Mitchner
 Thomas Downer
 301 South Tryon Street, Ste 1760
 Wachovia 2 Center
 Charlotte, NC 28202

Kaitly Stevenson
 c/o Roberts & Mahoney
 Thomas M. Roberts
 101 E. Augusta Avenue
 Spokane, WA 99207-2407

Craig A. Stowe
 c/o Gauthier, Downing, LaBarre, Beiser
 & Dean
 John W. Houghtaling, II
 3500 N. Hullen St
 Metairie, LA 70002

Taryn Gremillion
 c/o Degravelles Palmintier & Holthaus
 Michael C. Palmintier
 618 Main Street
 Baton Rouge, LA 70801-1910

Sharon Tullock
 1680 Kingsport Highway
 Greeneville, TN 37745

Wanda Hawks
 10412 Royal Road
 Silver Springs, MD 20903